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8 UNITED STATES DISTRICT COURT  
9 FOR THE DISTRICT OF NEVADA  
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11 UNITED STATES OF AMERICA, )

12 Plaintiff, )

Case No.: 2:16-cr-00057-LRH-VCF-1

13 v. )

14 JIHAD ANTHONY ZOGHEIB, )

15 Defendant. )  
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18 **STIPULATION AND ORDER TO CONTINUE DUE DATES FOR FILING OF**  
19 **SENTENCING MEMORANDA**  
**(Eighth Request)**

20 IT IS HEREBY STIPULATED AND AGREED, by and between Defendant JIHAD  
21 ANTHONY ZOGHEIB, by and through his attorney (Richard J. Pocker, Esq. of the law firm of  
22 Boies Schiller Flexner LLP), and the Plaintiff UNITED STATES OF AMERICA (hereinafter,  
23 "the Government"), by and through its attorney (Assistant United States Attorney Patrick  
24 Burns), that the deadline for the filing of Defendant's sentencing memoranda be extended and  
25 continued to and including June 24, 2019. The Government shall have to and including July  
26 10, 2019 in which to file its responsive sentencing memorandum to that of Defendant  
27 ZOGHEIB.

28 This Stipulation is entered into for the following reasons:

1           1.       The present case is currently set for sentencing on July 16, 2019, having been  
2 most recently continued from May 15, 2019. On May 6, 2019, the Court granted the  
3 Government's Emergency Motion to Continue Sentencing Date, and the new sentencing date  
4 was set in a subsequent Order. The Presentence Investigation Report was disclosed on January  
5 30, 2019, in anticipation of the prior March sentencing hearing. On April 9, 2019 Defendant  
6 ZOGHEIB filed his Objections to the Presentence Investigation Report. Further investigation  
7 of background facts revealed additional potential errors in the Report, and Defendant  
8 ZOGHEIB filed his supplemental objections on April 22, 2019.

9           2.       In addition to the filing of objections to the Presentence Investigation Report,  
10 Defendant ZOGHEIB intends to file a Sentencing Memorandum to assist the Court in  
11 determining the appropriate sentence to impose. The Government also contemplates filing a  
12 responsive memorandum setting forth its sentencing arguments, or other suitable pre-  
13 sentencing filings. While ordinarily such memoranda are filed with the Court on the same date  
14 as the objections to the Presentence Investigation Report, the parties requested, and the Court  
15 previously approved, extensions of the deadline for the filing of Defendant ZOGHEIB's  
16 sentencing memorandum. In order to accommodate the schedule of Defendant ZOGHEIB's  
17 counsel, the parties hereby agree to a short further continuance of the due date for the filing of  
18 Defendant ZOGHEIB's sentencing memorandum from June 20, 2019 to June 24, 2019. The  
19 Government's response to the sentencing memoranda will be due on July 10, 2019. The  
20 sentencing date will be on July 16, 2019, as previously determined by the Court.

21           3.       Defendant ZOGHEIB is presently incarcerated, serving a sentence imposed in  
22 the Nevada state courts, and does not object to these specific extensions and continuances, so  
23 long as his sentencing date remains as July 16, 2019.

24           4.       The additional time requested herein is not sought for purpose of delay, but  
25 merely to allow counsel sufficient time within which to complete efforts relevant to making  
26 their respective sentencing presentations, in this unexpectedly complicated case. The requested  
27 extension, in light of the continuance of the sentencing date, will not adversely affect the  
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1 briefing and disposition of objections to the Presentence Investigation Report and the  
2 sentencing hearing, or any other relevant deadline.

3 5. This is the eighth request to continue the dates relative to the sentencing process,  
4 and the eighth request to continue the dates affected by the present Stipulation.

5 DATED this 19<sup>th</sup> day of June, 2019.

6 BOIES SCHILLER FLEXNER LLP

NICHOLAS A. TRUTANICH  
United States Attorney

7  
8 By: /s/ Richard J. Pocker  
RICHARD J. POCKER, ESQ.  
9 Counsel for Jihad Anthony Zogheib

By: /s/ Patrick Burns  
PATRICK BURNS, ESQ.  
Assistant United States Attorney

10  
11 **ORDER**

12 Based on the pending Stipulation of counsel, and good cause appearing,

13 IT IS HEREBY ORDERED THAT the deadline for the filing of Defendant  
14 ZOGHEIB's sentencing memoranda be continued to June 24, 2019. The Government shall  
15 have to and including July 10, 2019 in which to file a response to Defendant ZOGHEIB's  
16 sentencing memorandum.

17 DATED this 20<sup>th</sup> day of June, 2019.

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20 LARRY R. HICKS  
21 UNITED STATES DISTRICT JUDGE